

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

FILED IN CLERK'S OFFICE
U.S.D.C. - Atlanta

MAR 23 2020

JAMES N. HATTEN, Clerk
By: *BN* Deputy Clerk

In re: Equifax Inc. Customer
Data Security Breach Litigation

MDL Docket No 2800
No. 1:17-md-2800-TWT

CONSUMER ACTIONS

Chief Judge Thomas W. Thrash, Jr.

Correction and Supplement to Rule 59(e) Motion-A \$380 Million Fraud

Correction to Rule 59(e) Motion

The deleted document referenced in the Rule 59(e) motion is indeed on the docket, Objection Doc 913-2 the exhibit, my apologies. The objector attempted to intercept the package and correct that oversight but the post office failed to catch it, see Exhibit 1.

Fraud on the Court

The Court of Appeals for the Eleventh Circuit has defined “fraud upon the court” as “only that species of fraud which does or attempts to, defile the court itself, or is a fraud perpetrated by officers of the court so that the judicial machinery cannot performing the usual manner its impartial task of adjudging cases that are presented for adjudication.” *Travelers Indem. Co. v. Gore*, 761 F.2d 1549, 1551 (11th Cir. 1985).

Generally speaking, only the most egregious conduct, such as bribery of a judge or members of a jury, or the fabrication by a party in which an attorney is implicated will constitute a fraud on the court. Less egregious conduct, such as nondisclosure to the court of facts allegedly pertinent to the matter before it, will not ordinarily rise to the level of fraud on the court. . . .These parameters are strictly applied because a finding of fraud on the court permits the severe consequence of allowing a party to overturn the finality of a judgment.

Zurich N. Am. v. Matrix Svc., Inc., Nos. 04-5101, 05-5027, 2005 WL 2651382 (10th Cir.Oct. 18, 2005).

The Lawyers Engaged in Fraud on the Class and Court

Plaintiffs Response to Objections Doc 902 pg 41, is footnote 34 is the fraud on the court to obtain a \$380 million approval worth tens millions in fees before a bonus.

Class counsel and the steering committee all committed fraud on the court by creating a fraud scheme and continued to lie by omission starting on November 22, 2019 and in the four week period leading up to and including the fairness hearing date, They refused to acknowledge and address their lie and correct the record ever since. That objection and the other applicable filings are approval stopping and reversible causing which can't be beat so the lawyers' concocted a fraud which is why this scheme was planned and executed so they and the court would not have to address the issues. The court did not state on the record if it agreed with the lawyers lie or whether or not the court ignored the objection because it thought the objector had no standing due to the false day late declaration made by the lawyers. This fraud issue and/or merit issues will prevent an affirmance at the Eleventh.

All lawyers that are on CM/ECF did received all filings like Doc 899 Exhibit B-10 pg 1-49 especially page 49, buried in the docket, showing the objection was mailed on November 19, 2019 not November 20, 2019 as they falsely claimed to the court, Doc 913-2 shows more evidence of the false declaration with Doc 917 rounding out the evidence which appeared across multiple filings and mailings.

The lawyers were all made aware of this fraud lie on the class and court, ignored it and covered it up in a lie by omission scheme violating criminal law and the Rules Of Professional Conduct for their own individual benefits. This includes lawyers that are not on class counsel or the steering committee that received those filings in their email boxes and remained silent when they should have come forward.

The evidence that is on the docket is more than enough for the court to also justify an immediate recall of its approval from the Eleventh Circuit so as to not waste the circuit's or the objector's resources over the next nine months for the inevitable reversal that has to be made and the lawyers ejection from this case.

All this objector and 147.9 million victims are left with are a multitude of unresolved, meritorious, reversible issues left unaddressed by the lawyers and the court. Something is really, really wrong here. Oh and Mr. Canfield, this filing is being sent to "taxpayer" funded entities and others for their review.

I certify under penalty of perjury all of the above is true to the best of my knowledge and belief.

Respectfully Submitted,



Christopher Andrews, Pro se objector

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Dated March 17, 2020

Certificate of Compliance

I hereby certify that this filing has been prepared in compliance with Local Rules 5.1 and 7.1 (if applicable.)



Christopher Andrews, Pro se objector P.O. Box 530394 Livonia, MI 48153-0394

T. 248-635-3810 E. caaloe@gmail.com Dated March 17, 2020

RULE 7.1(D) CERTIFICATE OF FONT COMPLIANCE

I hereby certify that the foregoing has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1(C), Northern District of

Georgia, specifically Times New Roman 14 point. (if applicable)



Christopher Andrews, Pro se objector P.O. Box 530394 Livonia, MI 48153-0394

T. 248-635-3810 E. caaloe@gmail.com Dated March 17, 2020

Certificate of Mailing

I certify that this document was sent to the Clerk of the Court via first class mail

with copies sent to everyone else who are registered with CM/ECF.



Christopher Andrews, Pro se objector P.O. Box 530394 Livonia, MI 48153-0394

T. 248-635-3810 E. caaloe@gmail.com Dated March 17, 2020

Exhibit 1



caaloe . <caaloe@gmail.com>

USPS - Your Package Intercept Request

1 message

auto-reply@usps.com <auto-reply@usps.com>
To: caaloe@gmail.com

Sat, Mar 14, 2020 at 2:57 PM



Order #: o1346797832

Hello c andrews,

Thank you for using USPS.com.

We received your Package Intercept Request.

The total price is an **estimate** based on the weight, dimensions, and mail class of your package. The actual postage is determined after your package arrives at your local Post Office™ and is weighed and rated.

USPS does not charge your credit card until the package's actual postage is determined. USPS only charges the estimated amount or less.

If the actual postage is more than the estimated postage, USPS will notify you by email or text and the **entire actual postage price must be paid with cash, check, or Money Order when your package arrives.**

Example: If your estimated postage is \$11.50 but the actual postage is \$13.50, you must pay the carrier \$13.50 with cash, check or Money Order when your package arrives.

Your request details are below. **Note: You cannot edit or cancel this request**

Request Date: 03/14/2020

Delivery Request for: CLERK OF THE COURT

Original Destination: 75 TED TURNER DR SW STE 2211
ATLANTA, GA 30303-3318

Estimated Total: \$14.65

Requested Destination: PO BOX 530394

LIVONIA, MI 48153-0394

Item	Price	Total
Package Intercept Request		
Subtotal:		\$14.65
Estimated Total:		\$14.65

Christopher Andrews
P.O. Box 530394
Livonia, MI 48153-0394

CERTIFIED MAIL®



7015 1660 0000 8469 6933



1000



30303

U.S. POSTAGE PAID
FCM LG ENV
LAKELAND, MI
48143
MAR 17, 20
AMOUNT
\$4.75
R2305K137140-4

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MAR 23 2020
U.S. Marshals
Atlanta, GA

Clerk of the Court
Richard B. Russell Federal Building
2211 United States Courthouse
75 Ted Turner Drive, SW Ste. 2211
Atlanta, GA 30303-3309

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